

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
v.) No. 14 CR 468
) The Honorable Harry D. Leinenweber
BEAU B. BRINDLEY and)
MICHAEL THOMPSON)

AGREED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS TO FILE MOTIONS
RELATING TO UNRESOLVED DISCOVERY ISSUES

Now come the Defendants Beau B. Brindley and Michael Thompson, by their respective attorneys Cynthia Giacchetti and Edward M. Genson, and with the agreement of the Government by its counsel Assistant United States Attorneys Michael Chmelar and Mel Johnson, and hereby respectfully move this Court for an extension of time to file motions relating to unresolved discovery issues on or before June 2, 2015.

In support of this Motion, the following is stated:

1. Defendants' pretrial motions are presently due on May 19, 2015.
2. Defendants will file a number of pretrial motions on May 19, 2015.
3. Counsel for the Defendants and counsel for the Government have been in

communication on a variety of discovery issues. The Government is presently preparing a response to the Defendants' second written discovery request which was sent to them on May 6, 2015. The Government indicates that they will be able to reply on Friday May 22, 2015.

4. The parties are working to resolve as many discovery issues as possible without having to involve the Court.

5. Depending on the Government's response on May 22, 2015, there may be some issues that the Court will need to resolve. However, it was not possible to determine what issues, if any, remain prior to May 19, 2015.

WHEREFORE, the parties agree that the Defendants Beau B. Brindley and Michael Thompson should be given an extension of time to file motions relating to unresolved discovery issues on or before June 2, 2015.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Cynthia Giacchetti, attorney for the Defendant Beau B. Brindley, certifies that "Agreed Motion for Extension of Time for Defendants to File Motions Relating to Unresolved Discovery Issues" was served on all parties on May 19, 2015, in accordance with Fed.R.Crim.P. 49, Fed.R.Civ.P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/ Cynthia Giacchetti